

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN A. MILES,

Plaintiff,

v.

HOME DEPOT U.S.A., INC.,

Defendant.

CASE NO. 08 CV 2734

HONORABLE JAMES F. HOLDERMAN

MAGISTRATE JUDGE MASON

DEFENDANT'S RULE 26 CORPORATE DISCLOSURES

Defendant, Home Depot U.S.A., Inc., by its counsel, submits the following disclosures as required by Fed. R. Civ. P. 26(a)(1).

A. Witnesses

The following individuals are likely to have discoverable information relevant to the disputed facts alleged with particularity in the pleadings. As to the subjects of information about which these individuals may have knowledge, please note that the information set forth below was prepared by counsel and is a general statement of the subjects which these persons are believed to have knowledge. The statements are based upon information and belief of counsel and the individuals may have information which varies from or is in addition to the information described below. All persons who are, or were, employees of Home Depot can be contacted for a deposition through Defendant's counsel.

1. Jody Beemsterboer. Ms. Beemsterboer, a current employee, may testify to her employment by Home Depot generally, Mr. Miles' employment, Home Depot's policies and procedures, as well as other matters relevant to this litigation.

2. Jeff Ferreira. Mr. Ferreira, a former employee, may testify to his employment by Home Depot generally, Mr. Miles' employment, Home Depot's policies and procedures, as well as other matters relevant to this litigation. Mr. Ferreira's last known address and phone number are as follows: 304 N Locust, Frankfort, Illinois 60423, (815) 464-7052.

3. Norma Gonzalez. Ms. Gonzalez, a former employee, may testify to her employment by Home Depot generally, Mr. Miles' employment, Home Depot's policies and procedures, as well as other matters relevant to this litigation. Ms. Gonzalez' last known address and phone number are as follows: 2017 Spruce Road, Homewood, Illinois, 60430, (708) 557-3644.

4. Nicolas Karch. Mr. Karch, a former employee, may testify to his employment by Home Depot generally, Mr. Miles' employment, Home Depot's policies and procedures, as well as other matters relevant to this litigation. Mr. Karch's last known address and phone number are as follows: 930 Havenshire Ct, Naperville, Illinois 60565, (309) 531-4500.

5. Michael Koulianos. Mr. Koulianos, a former employee, may testify to his employment by Home Depot generally, Mr. Miles' employment, Home Depot's policies and procedures, as well as other matters relevant to this litigation. Mr. Koulianos' last known address and phone number are as follows: 3623 Caine Drive, Naperville, Illinois 60564 (630) 904-4569.

6. Michael Wong. Mr. Wong, a current employee, may testify to his employment by Home Depot generally, Mr. Miles' employment, Home Depot's policies and procedures, as well as other matters relevant to this litigation.

7. Designated Records Keepers for the EEOC, Illinois Department of Employment Services, any of Plaintiff's prior and subsequent employers, and any of Plaintiff's treating

physicians. These representatives may testify to the documents in their respective files and to statements made by Plaintiff, as well as other matters relevant to this litigation.

9. All persons identified in any: (1) document produced by either Plaintiff or Defendant; (2) pleading; or (3) deposition.

B. Documents

The following documents in Home Depot's custody may be relevant to the disputed facts alleged with particularity in the pleadings. The documents are either in Plaintiff's possession, and/or will be produced to Plaintiff upon request, on the condition that any confidential documents be produced subject to the entry of an agreed upon Protective Order.

1. Miles' Personnel File.
2. Miles' Medical File, if any.
3. Miles' Unemployment File, if any.
4. Store Manager Job Description.
5. Other applicable Company policies.

C. Damages

Defendant's attorneys' fees.

D. Insurance Agreements

Above certain self-retained limits, Defendant has insurance coverage available to satisfy part or all of any judgment.

Defendant reserves the right to supplement these disclosures in accordance with the Federal Rules of Civil Procedure.

LITTLER MENDELSON, P.C.

/s/ Charles C. DeWitt, Jr.

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Attorney for Defendant

DATED: July 21, 2008

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he served a copy of *Defendant's Rule 26 Corporate Disclosures* to the following via U.S. Mail, postage prepaid on July 21, 2008: Lyndon C. Molzahn, Menges & Molzahn, LLC, 20 North Clark Street, Suite 2300, Chicago, Illinois 60602.

Charles C. DeWitt, Jr.